



March 12, 2008

Honorable Ross Johnson, Chairman  
Honorable Timothy A. Hodson, Commissioner  
Honorable A. Eugene Huguenin, Commissioner  
Honorable Robert Leidigh, Commissioner  
Honorable Ray Remy, Commissioner

Fair Political Practices Commission  
428 J Street, Suite 620  
Sacramento, CA 95814

**RE: Agenda Item #10: Prenotice Discussion of Repeal and Readoption of Regulation  
18944.2 - Gifts to an Agency.**

Dear Chairman Johnson and Commissioners:

California Common Cause applauds your action to propose changes to the current regulations regarding gifts to public agencies.

The proposed amendments will streamline the disclosure process for the giving of gifts to public agencies and provide the public and the Commission with better information concerning the acceptance and use of such gifts, especially in regards to travel. While the proposed amendments would not ban gifts to public agencies, it would improve the process by requiring specific reporting of such gifts and streamlining this disclosure.

Additionally, the proposed ban on gifts to an agency for travel of an elected official will help to provide the Commission and public with a better understanding of the purpose of the travel gift. Elected officials will continue to be allowed to accept travel payments reportable on their statements of economic interests, and subject to applicable restrictions. This will provide a clearer process, for both the Commission and the public, for determining the nature of the travel payment, removing the need to speculate as to whether it is indeed for the agency or a specific elected official.

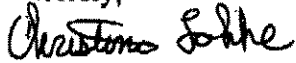
Finally, the proposed amendments will ensure that gifts to an agency for travel fall within the agency's own travel policies. By including the requirement that travel payments to an agency may not exceed the agency's own reimbursement rates for travel, meals and lodging, all agency

related travel must follow the same rules, regardless of whether the travel was paid for by a gift. Therefore, no additional benefit to specific employees can be inferred.

The proposed amendments will help to ensure that the Commission, and the public, has access to improved information regarding gift giving to public agencies, while also streamlining the process and making it more transparent to everyone.

Thank you for your consideration of this issue.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christina Lokke".

Christina Lokke  
Policy Advocate, California Common Cause